

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,)
)
 Plaintiff,)
)
 vs.)
)
 PLAZA HOTELS, LLC; STEVE KETTER;)
 MICHAEL WILEY; OKC AIRPORT ES,)
 LLC; ESH STRATEGIES FRANCHISE,)
 LLC; KAJAL HOSPITALITY, INC;)
 JALIYAN HOSPITALITY, INC; SUPER 8)
 WORLDWDE, INC; RAJ KRUPA HOTEL,)
 LLC; DAYS INNS WORLDWIDE, INC;)
 CHAND & SAAJ HOSPITALITY, INC;)
 RAMADA WORLDWIDE, INC; YASH)
 ENTERPRISES, INC; HOWARD)
 JOHNSON INTERNATIONAL, INC;)
 NOOR HOTEL, LLC; AMBICA, LLC;)
 OM, LLC; INDRA, LLC; AND G6)
 HOSPITALITY FRANCHISING, LLC,)
)
 Defendants.)

Case No. 5:25-cv-00462-G

MOTION FOR ADMISSION *PRO HAC VICE* OF DAVID S. SAGER

Kaylee Davis-Maddy, attorney for Super 8 Worldwide, Inc., Days Inns Worldwide, Inc., Ramada Worldwide, Inc., and Howard Johnson International, Inc. (“Wyndham Franchisor Defendants”), respectfully requests this Honorable Court to enter an Order admitting David S. Sager of the law firm of DLA Piper LLP (US) (“DLA Piper”), to practice before this court in the above-captioned case and all proceedings or contested matters arising in or related to this case (including any further adversary proceedings) on behalf of the Wyndham Franchisor Defendants and in support thereof states as follows:

1. Mr. Sager is currently an attorney with the law firm of DLA Piper with an address of 51 John F. Kennedy Parkway, Suite 120, Short Hills, New Jersey 07078-2704, telephone number of (973) 520-2550 and an email address of david.sager@us.dlapiper.com.

2. He was admitted to the bar of the state of New Jersey in 1992 and has remained in good standing since his admission. He has also been admitted to practice in the state of New York, the Third Circuit Court of Appeals, the Eleventh Circuit Court of Appeals, the United States District Court for the District of New Jersey, the United States District Court for the Eastern District of New York, the United States District Court for the Southern District of New York, and the United States District Court for the Eastern District of Michigan. He was also admitted to practice in the United States District Court for the District of Colorado, but such admission is no longer active.

3. He has never been subject to any disciplinary action by any bar association.

4. The Wyndham Franchisor Defendants desire to have Mr. Sager serve as their counsel, in association with the Movant, in this action.

5. Pursuant to Local Rule 83.2(g), Mr. Sager's Request for Admission Pro Hac Vice is attached hereto as Exhibit 1, and he is simultaneously tendering the required fees.

6. Movant believes Mr. Sager is qualified for *pro hac vice* and that just cause exists for such admission.

WHEREFORE, Kaylee Davis-Maddy, as attorney for the Wyndham Franchisor Defendants, respectfully requests this Honorable Court to enter an Order admitting David S. Sager to practice before this Court for the limited purpose of representing the Wyndham

Franchisor Defendants in this action and any proceedings or contested matter arising in or related to this action, including pending and any further adversary proceedings.

Dated: May 29, 2025

**DOERNER SAUNDERS DANIEL &
ANDERSON, L.L.P.**

Respectfully submitted,

Doerner, Saunders, Daniel
& Anderson, L.L.P.

s/ Kaylee P. Davis-Maddy

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CERTIFICATE OF SERVICE

I hereby certify that, on May 29, 2025, a true and correct copy of the foregoing document was served upon the following via the Court's electronic notification system, electronic mail to:

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